

## **CIVIL SOCIETY REPRESENTATIVES**

### **POSITION**

#### **On the published version of the Climate Change Strategy of Georgia 2030 (CSAP) and the Climate Action Plan 2021-2023**

On December 23, 2020, the Greens Movement of Georgia / Friends of the Earth - Georgia organized the Conference with participation of Georgian Climate Change Public Network to discuss Georgia's 2030 Climate Change Strategy (CSAP) and the 2021-2023 Climate Change Action Plan (CAP). The participants concluded that:

Georgia has reached substantively new levels in responding to climate change challenges;

Approaches to the climate change challenges have got a systematic character with targeted and coherent actions;

**The process of developing the Nationally Determined Contribution (NDC), the Climate Change Strategy of Georgia 2030 (CSAP) and the Climate Change Action Plan for 2021-2023 (CAP) was open compared to other processes of public interest.**

Welcomes the fact that some of the feedbacks and suggestions of the public sector have already been reflected in the reviewed versions of the documents;

Nevertheless, in order to successfully fulfill the obligations under the Paris Agreement, these documents require a thorough revision according to the following comments and proposals.

#### **General comments/remarks:**

##### **We believe that:**

In order to better understand the documents, similar parameters and values should be reflected in the same units/measurements;

The documents (except of the action plan) are overloaded with less important texts. Unreasonably large amount of space is devoted to describing the current situation, while the part of future strategy, goals and objectives is less informative than it should be.

Conditional obligations are insufficiently reflected, while the existing records raise suspicions that Georgia is not ready to receive international assistance (maybe this is the reality?!).

In the documents there is no focus (except of the forest sector) on strengthening and deepening public support and protecting their constitutional rights. In this regard, the Climate Change Strategy of Georgia 2030 (CSAP) and the Climate Change Action Plan for 2021-2023 (CAP) do not reflect NDC requirements in a sufficient manner;

The documents have no focus on increasing the possibilities for the reduction of emissions through generating and supporting the innovations, in parallel to the economic development;

No proper attention is paid to the reduction of emissions through further involvement of municipalities.

Fragmented involvement of self-governments in climate change is a systemic problem and the decentralization of the country in this direction is also necessary for success.

Increasing the authority of local and regional governments to address climate change mitigation and adaptation issues, as well as tackling energy poverty, will enable them to build and strengthen their own institutional and human capacity. And the latter will extend the opportunities for institutional development and effective use of experience created through the efforts of donor projects.

Twenty out of twenty four objectives from 2021-2023 CAP do not set a specific target for 2023, which would impede monitoring and evaluation of results. It is necessary to specify the tasks for 2023;

The documents do not reflect the reality created by the COVID-19 pandemic and the forecasts for economic development in the post-pandemic period, which would make significant changes to GHG emission estimates by 2030;

In the documents there are no proper assessments and reflections on the role of biodiversity as a key factor in mitigating the climate change;

The National Defined Contribution (NDC) document should set out more clearly future adaptation plans, strategy and specific objectives.

Most of the indicators of the 2021-2023 CAP do not correspond to the content of the task and are not measurable (countable). The current indicators provide no possibility to evaluate the work done for fulfilling the relevant objective and the outcomes;

Given the statement made by the authors of the documents at the conference that work is underway to refine and improve the indicators, we hope that for each objective an appropriate and measurable indicator of the content will be selected, enabling to conduct univocal evaluation of results;

### **Assessment of the "ambition" of climate change mitigation goals**

According to Article 4(3) of the Paris Agreement, the Parties shall make commitments in accordance with the "highest possible ambition".

We believe that the approaches reflected in Georgian documents are based on "modest ambition", which is not enough and fair;

We categorically distance ourselves from the view that due to Georgia's low share in global warming factors, no efforts should be attached against this challenge.

We believe that the 35% emission limit on unconditional commitments should be increased to at least 40% compared to the baseline level;

We are aware that many countries, including Georgia, do not take the challenges of climate change seriously.

The world response to the challenges of the COVID-19 pandemic is the evidence of this.

To save our lives, we have made it possible to mobilize solid financial resources; a vaccine was created in the shortest period of time; we accepted imposition of strict restrictions and bans; and the economy stalled. But not the same diligence is attached to the care for the next generation;

We express our dismay and outrage at such an approach: what concerns us (the pandemic) - the present generation - worries us far more than what would concern our children and grandchildren in the future.

And the reality dictates that the negative impact stemming from the global warming will be tougher, with increased threat, rather than any pandemic.

Moreover, the global warming may become the source and cause of many other pandemics.

## **Notes and proposals by sectors**

### **Transport sector**

We believe that there is no regulation for transport sector in Georgia, while it is the largest contributor to the economy, as well as to the total rate of GHG emissions.

The country also lacks the strategy for the development of the transport sector, and there is no state structure responsible for this area either, including the relevant unified regulatory act, etc.

The forecast that "from 2015 to 2030, passenger activity will increase by 60% and freight activity - by 240%" seems overly optimistic.

Under such conditions, we think that the reduction of GHG emission in the transport sector for 2030 by 15% compared to the baseline level may not be considered as a limit of opportunity and the set goal may not be consider as "maximum possible ambition".

We wonder, whether it is possible to achieve such considerable reduction of emission only through sporadic actions? And why is it impossible to achieve more ambition results against the background of improved conditions in the sector management?

### **Energy generation and transmission sector**

In the strategy document there is a reference to the expectation that in 2030 the country's annual electricity consumption will significantly exceed 20 billion kWh, which is about 60% more than in 2020.

We fail to understand realistically the expectation of the Action Plan (CAP) that by 2023 (even by 2030) the power plants with a total capacity of 1333.56 MW (wind 560 MW, solar 92 MW and hydro 681.56 MW) will be put into operation.

It seems that these expectations have become the basis for estimating the expected emissions from the energy generation and transmission sector by 5687 KT (CAP - Target 1) (1.56 times higher than the 2015 level).

Since the strategy paper does not address the construction of new fossil fuel generation facilities, such a forecast raises a number of questions, including:

- How realistic is the expectation of generating more than 20 billion kWh of electricity per year?
- Despite the increase in the share of renewable energy, the increase in the efficiency of existing thermal power plants and a number of energy efficiency measures, why should emissions from the energy sector increase on this scale?
- Etc.

Particular attention was paid to the interest of the Georgian Energy Development Fund - in connection with the construction of a biogas power plant and the use of amaranth for this purpose.

We support the expansion of biogas production and the activation of the state in this direction, although we consider it categorically unacceptable to build energy plantations for this purpose.

We find as a gap the lack of consideration of geothermal potential of Georgia in the documents.

We believe that the documents should adequately reflect Georgia's geothermal potential and its potential for mitigating climate change through its effective use. In this regard, it is advisable to:

- Reassess the condition of existing thermal deposits and promote their full development;
- Facilitate the introduction of modern technologies for the efficient exploitation of geothermal deposits;
- Get interested the industries in developing geothermal potential by creating appropriate financial mechanisms and guarantees.

Specific objective (task) 1.3 of the Action Plan is noteworthy with this regard of the same sector.

Due to such substantial and other no less important inaccuracies, we believe that the goals and objectives of this sector need to be revised, refined and brought closer to reality.

### **Building Sector**

We believe that the documents do not provide an in-depth consideration of the systemic challenges in this sector, which casts a doubt on the effectiveness of the planned activities and the stability of the results achieved.

The systemic problem is the uncertainty of the persons responsible for the operation of the buildings. Neither in the public nor in the private sector is there a practice of appointing professionals responsible for the maintenance of the building, who must take care of energy efficiency, energy saving, other relevant issues and at the same time be accountable for the proper outcomes;

We believe that these systemic deficiencies will make it impossible to ensure quality monitoring and proper functioning of the reporting system;

It is difficult to establish a causal link between some of the goals and activities planned in the sector. For instance:

Despite raising the energy efficiency of buildings, certification, equipping buildings with energy-efficient light bulbs, and a number of other planned activities, energy sector estimates predict that "by 2030, emissions from the energy sector in the building sector may be twice as high as in 2015."

This expectation is further enhanced by the Climate Action Plan (Goal 3), providing assumption that by 2030 the emissions from the building sector will increase by 2.38 times compared to 2015.

It is hard to imagine that the increase in the share of renewable energy in generated energy, the increase in prices for energy carriers, the increase of energy efficiency and other similar measures can increase the emissions of energy demand in buildings twice and more.

Emissions of this scale may not be affected even by such factors as population size, increased heating area during the autumn-winter period, etc.

We believe that the forecast figures are artificially increased and the aim is to increase – again artificially - the efficiency of the work done to reduce emissions, which is unfair;

The following activities should comply with each other: 3.3.1 and 3.3.2 .:

Activity 3.3.1 has the aim to replace all (100%) of incandescent halogen bulbs with energy-efficient bulbs by 2022 in residential and commercial buildings, also in all public buildings, except schools and kindergartens.

Activity 3.3.2 has the aim to have by 2030 “70% of public buildings with energy efficient bulbs”.

We think that the numerical expression of the levels to be achieved within Objective 3.1 and Objective 3.4 requires clarification - 100%.

The 100% target is obviously impressive, however the percentage does not reflect the real situation as a 100% increase in zero starting conditions will be for certification of 10, 100 and even 1000 buildings, and also hot water supply through the solar energy.

We believe that the submitted comments and suggestions provide sufficient ground to reconsider the possibilities of reducing emissions from this sector and to make the use of the most of the existing potential.

### **Industrial sector**

The presented documents do not fully explore the possibilities of reducing emissions in the industrial sector.

It seems that these documents reflect either completed or pending activities aimed at reducing emissions, while solid reserves (in in production of steel cast iron, non-ferrous metals and other industrial products) steel production,), which could ensure considerable mitigation of climate change, remain without attention.

We believe that immediate steps need to be taken promptly to clearly reflect in the action plans for the post-2023 period all the possibilities of reducing emissions from the industrial sector and to make appropriate changes to the goals to be achieved by 2030.

### **Agriculture Sector**

According to the 2021-2023 Action Plan, activities aimed at reducing emissions in the field of agriculture do not correspond to the optimal scenario for the development of this sector and it is unrealistic (even if implemented) to expect a reduction in the planned amount of emissions;

We believe that emissions can be reduced if the development of the sector is based on agro-ecological principles and an ecosystem approach.

Due to the sector specific situation, we believe that, contrary to the approaches presented in the documents, all goals, objectives and activities in this sector should be part of a single concept aimed at food security, conservation of agrarian biodiversity, climate change mitigation, traditional product development, household farming development and will be focused on achieving long-term complex results;

Given the significant differences between the challenges of the agricultural sector by region, we believe that the situation in the strategy document should be assessed in a regional context and the goals, objectives and activities should be planned according to the relevant priorities.

We think that a unified approach will not bring equal and desirable results for all regions;

We find reasonable to formulate Goal 5 as follows:

"Promoting low-carbon agricultural development through the use of climate-friendly and energy-efficient technologies, promoting bio-production and promoting agro-ecological development based on ecosystem principles".

We think that Objective 5.2, actions 5.1.1, 5.2.1, 5.2.3 and others do not imply these requirements.

We believe that the activities identified in the Action Plan for 2021-2023 are not part of a unified strategy and there is a weak causal link between them, which calls into question the sustainability of the results of these activities;

We find it reasonable to include in the activities:

- Implementation of programs promoting sustainable soil and pasture management;
- Promotion of Bio (organic) production;
- Improvement and implementation of legislation on land conservation and pasture management;
- Development of technical regulations on animal feeding practices used by livestock production farms;
- And others.

We think that the thematic and quantitative studies provided for in the Action Plan are insufficient to fulfill the commitments made in the Paris Agreement.

Based on the planned studies, it will be hard to set goals and activities in the action plans for the following periods, which would create a solid basis for the development of the agricultural sector and guarantee emission reductions from this sector.

### **Waste sector**

The goals and objectives of this sector are fully in compliance with the relevant indicators of the National Waste Management Strategy 2016-2030 and unlike to other sectors are clearer and more specific, although the starting conditions for 2020 are presented in the desired form, which differs significantly from the reality.

Many of the tasks set out in the National Waste Management Plan 2016-2020 are unfulfilled or partially fulfilled, including some important directions, such as:

- Construction of the new landfills;
- Provision of adequate infrastructure for the landfills;
- Target indicators for waste collection;
- Scale of connection to sewerage systems;
- Closure-conservation of spontaneous landfills;
- Regulation of accounting system;
- Etc.

Therefore, all such inaccuracies should be removed from the document and the obligations not yet fulfilled under the National Action Plan for Waste Management 2016-2020 should be redistributed to 2021-2023, albeit within the possible limited period of time.

We believe that the task of reducing emissions from the waste field should be highly ambitious, as there is adequate potential and it is completely realistic to use this potential effectively.

### **Forest sector**

Against the background of the commitments made under the Paris Agreement, we find not ambitious the goals and objectives set for the forestry sector;

Increasing the carbon sequestration potential of Georgia by 10%, restoring 625 hectares of forest in 3 years (average 208 ha per year) and promoting natural renewal on 2,411 hectares in 5 years (average 480 ha per year), can not guarantee at all that in the second half of XXI century Georgia's forests, as the main environment for absorbing GHGs, will be able to balance greenhouse gases emitted from other areas.

We believe that achieving the planned indicators to promote forest restoration and natural renewal does not require regulated activities at the government level, as nature itself can produce much better results if we stop illegal logging and unlimited exploitation.

It is also unacceptable that all 9 planned activities in this sector are considered as conditional obligations and will be implemented without state funding.

We believe that if such a pace of forest care is maintained, it will be impossible to achieve the sustainability of Georgia's forests even by the end of this century.

The issues related to the increased opportunity and the relevant safeguards for public participation in the review of the documents under consideration and the evaluation of the results, attracted particular attention of the members of the Climate Change Network.

### **We believe that:**

The 2030 Climate Change Strategy (CSAP) and the Climate Change Action Plan 2021-2023 (CAP) should include activities that strengthen the capacity of community members and NGOs and their engagement in developing and implementing adaptation plans for climate change mitigation.

Transparency and access to information on climate change-related processes should be significantly enhanced;

The "Enhanced Transparency Framework" provided for in the Paris Agreement should be established and implemented within the shortest period of time;

Reports required under the documents should be available to anyone;

A national system of measurement, reporting and verification (MRV) should be established and put into operation within the shortest period of time;

For the purpose of awareness raising among the general public it is not enough to provide information on climate change issues only electronically. It is necessary that the relevant government decisions and reports of state structures be systematically covered by the media.

Extensive coverage of climate change mitigation and adaptation implementation processes by regions, municipalities, and sectors of the economy will significantly increase the involvement of NGOs and community representatives in these regions;

The state should provide support to the NGOs and members of the public to conduct public monitoring over the climate change challenges.

The responsibility of state structures and individual officials should be increased in case of restriction or obstruction of the involvement of public representatives and non-governmental organizations.

The responsibility of state structures and individual officials should be increased in case of ignoring or neglecting the fair and lawful demands of public representatives and non-governmental organizations;

The responsibility of state structures and individual officials should be increased in case of non-fulfillment or partial and poor performance of the tasks set by the strategic documents and action plans.

1. Greens Movement of Georgia / Friends of the Earth
2. Society Development Center of Akhaltsikhe
3. Non-profit Organization Green Regions
4. Akhalsopeli Youth Center
5. Koda Community Education Center
6. NGO Women for County's Future
7. Union of Scientists of Imereti Region "Spectrum"
8. Women for Common Future / WECF Georgia;
9. Movement for Sustainable Development of Georgia
10. Foundation Caucasus Ecology
11. NGO Woman and Development
12. Kutaisi Informational Center
13. Lagodekhi Local Action Group (LAG)
14. Rural community Development Agency
15. Georgian International Development Agency
16. Georgian Health Promotion and Education Foundation
17. Biological Farming Association ELKANA
18. Association DEA
19. Railway Workers Trade Union Club
20. Scientific-intellectual Club 'Dialogue of Generations'
21. Association Women for Regional Development
22. Association SEMA
23. Bolnisi Language House
24. Georgian Association for Effective Use of Energy Resources
25. Kvemo Kartli Women NGO Ertoba (Unity)
26. Organization Bioenergy
27. Expert Union "Sustainable Energy and Environment"
28. Industry Innovative Development Center
29. Green Alternative